

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
RICHMOND DIVISION

ROBERT DAVID STEELE )

-and- )

EARTH INTELLIGENCE NETWORK )

Plaintiffs, )

v. )

JASON GOODMAN )

PATRICIA A. NEGRON )

-and- )

QUEEN TUT, A Woman Believed To Be )  
Known As Carla A. Howell )

Defendants. )

Case No. 3:17cv601

DEFENDANT JASON GOODMAN'S ORIGINAL ANSWER

Plaintiffs, Robert David Steele and Earth Intelligence Network, by counsel, have filed a frivolous Complaint with no evidentiary value against Defendant, Jason Goodman ("Goodman" or "Defendant").

Plaintiff seeks (a) compensatory damages, statutory damages (three-fold the damages sustained), and punitive damages in an amount not less than \$15,350,000.00, however this amount is arbitrary and not reflective of the value of Plaintiff's current or past business operations or annual earnings as reported in 990 forms submitted to the IRS.

Defendant denies all of the factual allegations in the first two paragraphs of the Complaint.

Intruduction

Defendant denies all of the factual allegations in the three paragraph introduction to the Complaint.

Parties

1. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 1.
2. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 2.
3. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 3.
4. Defendant admits to all allegations in paragraph 4 with the exception of two. Defendant has never claimed to be nor carried out the duties or actions of a professional actor. This claim is false and is denied. Secondarily, defendant has never stated that Crowdsorce the Truth is the "original open source independent news agency" as claimed. Defendant also denies this portion of Plaintiff's claim.
5. Defendant denies the allegations in paragraph 5.

6. Defendant denies the allegations in paragraph 6.

7. Defendant lacks knowledge or information sufficient to form a belief

about the truth of the allegations in paragraph 7

8. Defendant denies the allegations in paragraph 8 as to Goodman. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 8 as to Negron.

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**Jurisdiction and Venue**

9. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 9.
10. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 10.

**Statement of the Facts**

11. Defendant denies the allegations in paragraph 11.
12. Defendant denies the allegations in paragraph 12.
13. Defendant denies the allegations in paragraph 13.
14. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 14.
15. Defendant denies the allegations in paragraph 15
16. Defendant denies the allegations in paragraph 16
17. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 17.
18. Defendant denies the allegations in paragraph 18
19. Defendant denies the allegations in paragraph 19.

**COUNT I – DEFAMATION PER SE**

20. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 20.
21. Defendant denies the allegations in paragraph 21
22. Defendant denies the allegations in paragraph 22
23. Defendant denies the allegations in paragraph 23.
24. Defendant denies the allegations in paragraph 24
25. Defendant denies the allegations in paragraph 25
26. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 26 (Morphonios is unknown and not party to this suit).
27. Defendant denies the allegations in paragraph 27

COUNT II – INSULTING WORDS

- 28. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 28.
- 29. Defendant denies the allegations in paragraph 29
- 30. Defendant denies the allegations in paragraph 30
- 31. Defendant denies the allegations in paragraph 31

COUNT III– BUSINESS CONSPIRACY

- 32. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 32
- 33. Defendant denies the allegations in paragraph 33
- 34. Defendant denies the allegations in paragraph 34
- 35. Defendant denies the allegations in paragraph 35
- 36. Defendant denies the allegations in paragraph 36
- 37. Defendant denies the allegations in paragraph 37.

**COUNT IV – COMMON LAW CONSPIRACY**

38. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 38.
39. Defendant denies the allegations in paragraph 39.
40. Defendant denies the allegations in paragraph 40.

**COUNT V – TORTIOUS INTERFERENCE**

41. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 41.
42. Defendant lacks knowledge or information sufficient to form a belief about the truth of the allegations in paragraph 42.
43. Defendant denies the allegations in paragraph 43.
44. Defendant denies the allegations in paragraph 44
45. Defendant denies the allegations in paragraph 45(Tanner is unknown and not party to this suit)

Defendant denies the allegations in the two unnumbered paragraphs on page 36 of the Complaint.

Defendant denies the allegations in the Conclusion and Request for Relief section of the Complaint and denies that Plaintiffs are entitled to any of the relief sought.

**ADDITIONAL DEFENSES**

1. Plaintiffs have failed to state a claim upon which relief can be granted.
2. Defendant pleads the affirmative defenses of justification and privilege.
3. Defendant pleads the affirmative defense of truth to Plaintiffs' claims based on alleged defamation.
4. Defendant pleads that Plaintiff Robert David Steele is a public figure and must plead and prove malice on the part of Defendant.

CONCLUSION

WHEREFORE, Defendant respectfully requests that the Court enter a judgment that Plaintiffs take nothing on their causes of action against Defendant Goodman, dismiss their claims with prejudice, and requests such other and further relief to which he may be entitled.

By: /s/ Jason Goodman 

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Pro Se

*CERTIFICATE OF SERVICE*

I hereby certify that this 5 day of October, 2017, a true and correct copy of the foregoing Defendant's Original Answer was served on Plaintiffs and/or Plaintiffs' counsel of record in accordance with the Federal Rules of Civil Procedure.

/s/ Jason Goodman 

**Circuit Court for** Eastern Division Virginia

**Case No.** 3:17-cv-601-MHL

**City or County**

Robert David Steele and Earth Intelligence Networ

Jason Goodman

**Name**

**Name**

11005 LANGTON ARMS CT

**VS.**

252 7th avenue

6s

**Street Address**

**Apt. #**

**Street Address**

**Apt. #**

OAKTON, VA 22124 ( 571 ) 320-8573

New York NY 10001 ( 323 ) 744-7594

**City State Zip Code Area Telephone**  
**Code**

**City State Zip Code Area Telephone**  
**Code**

**Plaintiff**

**Defendant**

## **CERTIFICATE OF SERVICE**

**(DOMREL58)**

I HEREBY CERTIFY that on this 5 day of October, 2017, a copy  
of the document(s) entitled Answer Steele - Goodman  
was/were mailed, postage prepaid to:

**Title of Document(s)**

Steven Biss  
**Opposing Party or His/Her Attorney**

via email - stevenbiss@earthlink.net  
**Address**

**City State Zip**

10/5/2017

**Date**

**Signature**

